

File # ARD006354542

AFFIDAVIT OF  
A. MAX WATKINS

The Deponent, A. Max Watkins of Little Rock, Arkansas, herein affirms that the statements, representations and matters contained in this Affidavit are true to the best of his information and belief:

1. The Deponent began his employment with Olin Mathieson Chemical Corporation (a predecessor of Olin Corporation) on or about December 19, 1955 and presently is employed with the Olin Corporation, Little Rock, Arkansas, as Regional Safety Manager, Olin Chemicals Group.

2. In May, 1957, said Deponent was transferred to Olin's Houston Sulfur Plant, located on Wallisville Road, Houston, Texas where he was involved in supervising the production and quality control of dry and liquid pesticides and sulfur products. In 1950, Olin began formulating dry pesticides at this facility.

3. In March, 1966, the Deponent was promoted to Operations Superintendent of the Houston Sulfur Plant which included responsibility for the plant's production and maintenance of the total plant facilities.

4. In August, 1967, the Deponent was appointed Plant Manager of the Houston Sulfur Plant which included responsibility for directing all activities of this facility. The Deponent continued in this position until October 1, 1972 when he was appointed Superintendent, Shipping and Receiving at Olin's Pasadena Facility, Pasadena, Texas.

5. The Deponent continued to retain overall responsibility for the Houston Sulfur Plant until its official closure in December, 1972.

6. During the Deponent's tenure at the Houston Sulfur Plant, there were no waste ponds or other similar facilities constructed or maintained, for the on-site disposal of raw materials, intermediates, products, by-products, or chemical wastes, from the Plant's operations. Nor is the Deponent aware that such practices ever occurred at this facility. Therefore, the drawings appended to EPA's Photographic Analysis of the Olin Hazardous Waste Site, Houston, Texas, are in error when they make reference to waste ponds, dump areas, or similar designations suggesting on-site burial, dumping or disposal of operational wastes.

7. There were, however, two fire ponds, constructed on the aforesaid premises during the Deponent's tenure at this facility, which only contained rainwater and wellwater and were never used as a location or facility for disposal of any chemicals or chemical wastes. The purpose of these ponds was to provide sufficient quantities of water in the case of a fire, explosion or other similar occurrence.

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8. The designation "dump area", contained in the aforesaid diagrams, is also inconsistent with the practices, policies and procedures followed at Olin's Houston Sulfur Plant, during the Deponent's tenure, and inconsistent with and contrary to the Deponent's knowledge of this site's operational history. In short, the Deponent has no knowledge or information in connection with any burial, dumping or other disposal of any chemicals or chemical wastes other than the disposal conducted in the latter part of 1972, by Olin, subsequent to the closing of this facility, and more particularly described infra.

9. The alleged dump areas, characterized in Figures 6, 7, 8, 9 and 10, cannot be accounted for other than as a result of vehicular traffic, grading and a variety of construction related activities.

10. As noted, Olin did conduct limited on-site disposal in only one instance and that occurred on or about 1965. This on-site disposal consisted of the construction of a pit in the natural dense clay of the site to a depth of approximately six (6) feet and a width of approximately thirty (30) feet, rectangular in shape, located at the western boundary of the Wallisville Road property and is designated as Facility #16 in the attached site diagram (Exhibit A).

11. The Deponent states that based on his direct knowledge and information only a limited amount of sulfur, trash, miscellaneous rubble, and unknown (small) amounts of pesticides were buried in this pit. The amount of pesticides buried in this pit was not significant and only consisted of product wastes and did not include any raw materials or intermediates.

And further, the Deponent saith not.

A. Max Watkins

A. Max Watkins  
Olin Corporation  
Little Rock, Arkansas

STATE OF CONNECTICUT

COUNTY OF NEW HAVEN

On this 3rd day of May, 1983, before me the Subscriber, personally appeared, A. Max Watkins, who being duly sworn on his oath, doth depose and prove to my satisfaction that he is the said Deponent herein.

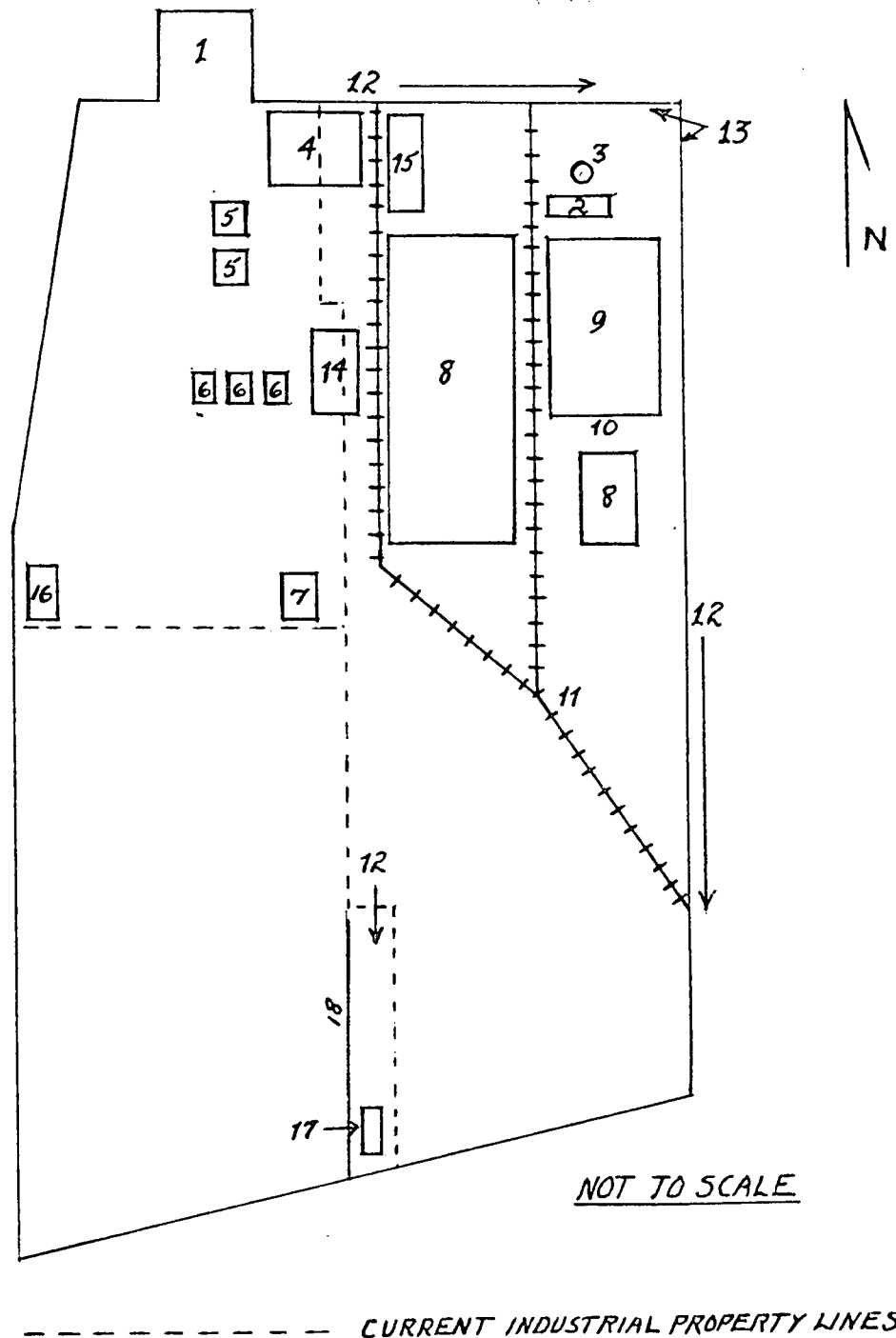
Brenda L. Leverett  
Notary Public

My Commission Expires: 3/31/88

# EXHIBIT A

## SITE OF FORMER OLIN HOUSTON SULFUR PESTICIDE FACILITY

1. FORMER OLIN LOT - NOW SEATRAN ENTRANCE
2. SULFUR STORAGE
3. TOXAPHENE TANK
4. DRY PRODUCTS FORMULATION
5. CHANGE HOUSES
6. PUMP HOUSE & FIRE PONDS
7. OFFICE
8. STORAGE
9. LIQUID PRODUCTS FORMULATION
10. RAMP
11. RAILROAD SPUR
12. DRAINAGE
13. CHAIN-LINK FENCE
14. BLACKBIRD HOUSE
15. SHOP & PARTS WAREHOUSE
16. PIT
17. SIGN
18. ENTRANCE ROAD



DRAWN FROM SKETCH SUPPLIED BY A.M. WATKINS 3/31/83  
BY J.A. SCOTT 4/7/83